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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS
GARY PIERCE - CHAIRMAN
BOB STUMP
SANDRA D. KENNEDY
PAUL NEWMAN
BRENDA BURNS

2012 APR 17 P 3:43

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF
UNS GAS, INC. FOR APPROVAL OF ITS
2011-2012 GAS ENERGY EFFICIENCY
IMPLEMENTATION PLAN.

DOCKET NO. G-04204A-11-0149

REQUEST TO:

1.) **AMEND APPLICATION OF 2011-
2012 GAS ENERGY EFFICIENCY
IMPLEMENTATION PLAN TO
INCLUDE APPROVAL FOR 2013
ENERGY EFFICIENCY PLAN**

AND

2.) **APPROVE MODIFIED WAIVER
REQUEST**

Arizona Corporation Commission

DOCKETED

APR 17 2012

DOCKETED BY

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On April 4, 2011, UNS Gas, Inc. ("UNS Gas" or "Company") filed its 2011-2012 Energy Efficiency Implementation Plan ("EE Plan"). On September 6, 2011, UNS Gas filed updated information in support of its EE Plan which included a request for waiver of the Gas Energy Efficiency Standards ("GEES") set forth in A.A.C. R14-2-2504. However, given the potential timing of the approval of the EE Plan, UNS Gas requests that approval of the EE Plan also cover 2013 ("2013 Plan"). Additionally, UNS Gas seeks modification of its requested waiver of the GEES in this docket to reflect the anticipated timing of approval of the EE Plan.

Request for Inclusion of Approval of 2013 Plan

Pursuant to A.A.C. R14-2-2505.A, UNS Gas is required to file its 2013 Plan in approximately six weeks (June 1, 2012). In its 2013 Plan, the Company does not plan to propose any changes to the proposed EE Plan programs, budgets, or Demand-Side Management Surcharge (DSMS) currently pending before the Commission in this docket. Therefore, in the interest of

1 conserving time and resources, UNS Gas requests that the Commission: (i) approve the pending
2 EE Plan to include the 2013 Plan and (ii) waive the requirement for UNS Gas to file a separate
3 2013 Plan on June 1, 2012.

4 **Modified Waiver Request**

5 In its September 6, 2011 filing, UNS Gas stated the following:

6 *The timing of the effectiveness and implementation of the GEES Rules, as*
7 *well as the delay in the approval of the EE Plan, makes it impossible for*
8 *UNSG to meet the cumulative EE Standard set forth in A.A.C. R14-2-*
9 *2504.B for 2011 through 2020. UNSG therefore requests a waiver and*
10 *modification of the GEES and further requests that the Company's GEES*
11 *be modified for all future EE Plan filings.*

12 The filing also contained a modified GEES to correspond with its waiver request. Since an
13 additional seven months have passed since UNS Gas filed its request for a modified GEES, UNS
14 Gas requests approval of the following modified GEES for the Company:

Requested Waiver To Standard		
Calendar Year	Cumulative Energy Efficiency Standard (Current)	Cumulative Energy Efficiency Standard (Requested Adjustment)
2011	0.5%	0.20%
2012	1.2%	0.5%
2013	1.8%	1.2%
2014	2.4%	1.8%
2015	3.0%	2.4%
2016	3.6%	3.0%
2017	4.2%	3.6%
2018	4.8%	4.2%
2019	5.4%	4.8%
2020	6.0%	5.4%

22 WHEREFORE UNS Gas requests that the Commission:

- 23
- 24 1. Approve the pending EE Plan (as supplemented in its September 6, 2011 filing) to
25 cover the period including 2013;
 - 26 2. Grant UNS Gas a waiver of filing a 2013 Plan on June 1, 2012; and
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1 Steve Olea
2 Director, Utilities Division
3 Arizona Corporation Commission
4 1200 West Washington Street
5 Phoenix, Arizona 85007

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7 By

Mary Appolito

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**REQUEST TO ADD
NAME TO SERVICE LIST**

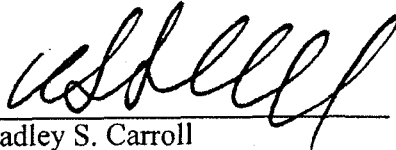
UNS Gas, Inc. hereby requests that Bradley S. Carroll be added to the service list in the
above docket. Service of all correspondence, documents or pleadings should be made to:

Bradley S. Carroll
UniSource Energy Services
88 East Broadway Blvd., MS HQE910
P. O. Box 711
Tucson, Arizona 85702

RESPECTFULLY SUBMITTED this 17th day of April, 2012

UNS Gas, Inc.

By


Bradley S. Carroll
UniSource Energy Services
88 East Broadway Blvd, MS HQE910
P. O. Box 711
Tucson, Arizona 85702

Michael W. Patten
ROSHKA DEWULF & PATTEN, PLC.
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004

Attorneys for UNS Gas, Inc.